

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DR. MANHUA MANDY LIN	:	
	:	
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION NO. 02-CV-3612
	:	
ROHM AND HAAS COMPANY	:	
	:	
Defendant	:	

**PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANT'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

GENERAL OBJECTION

Plaintiff objects to the Defendant's Second Request for Production of Documents addressed to Plaintiff on the grounds that the same was not timely served.

Plaintiff, Dr. M. Mandy Lin, by and through her counsel Leonard, Tillery & Sciolla, LLP hereby responds to Defendant's Second Request for Production of Documents as follows:

1. Objection. Any documents pertaining to the U.S. Department of Energy Grant No. DE-FG02-02ER83420 are privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Documents. Without waiving the foregoing, Plaintiff identifies the abstract submitted

for U.S. Department of Energy Grant No. DE-FG02-02ER83420 as published by the U.S. Department of Energy. (Document No. 1490).

2. Objection. Any and all Grant Applications associated with U.S. Department of Energy Grant No. DE-FG02-02ER83420 are privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

3. Objection. Any and all documents referring or relating in any way to the award of the U.S. Department of Energy Grant No. DE-FG02-02ER83420 are privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

4. See checks from EverNu Technology LLC to Dr. Manhua Mandy Lin. (Document No. 1489).

5. Objection. Plaintiff has had no role in the preparation of any Grant Applications since November 30, 1999, other than Grant Applications filed by EverNu Technology LLC. Any and all such Grant Applications are privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

6. Objection. Plaintiff has had no grants awarded to her since November 30, 1999. To the extent that grants have been awarded to EverNu Technology LLC, a business entity in which Plaintiff has an ownership interest, such grants are privileged as

confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

7. None.

8. Objection. Documents referring or relating to Plaintiff's ownership interest in EverNu Technology LLC are not relevant to the claim or defense of any party to this litigation nor is the requested of discovery reasonably calculated to lead to the discovery of admissible evidence. Plaintiff has no documents pertaining to employment by EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

9. See response to No. 4.

10. Objection. Grant Applications made by or on behalf of EverNu Technology LLC are privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

11. Objection. Any and all grants awarded since November 30, 1999 to EverNu Technology LLC privileged as confidential, proprietary information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document.

12. Objection. Any and all documents referring or relating to receipt of money by EverNu Technology LLC are privileged as confidential, proprietary

information belonging to EverNu Technology LLC. EverNu Technology LLC is not a party to this litigation and its property and/or documents are not subject to this Request for Production of Document. Plaintiff has received no monies from grants.

Respectfully submitted,

Leonard, Tillery & Sciolla, LLP

By:

Hugh J. Hutchison

Date: 6/16/03